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Attorneys for Plaintiff
TESLA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TESLA, INC., a Delaware corporation,

Plaintiff,

v.

GUANGZHI CAO, an individual,

Defendant.

)
) Case No. 19-cv-01463-VC
)
) **JOINT STIPULATION AND ~~PROPOSED~~**
) **ORDER TO SHORTEN BRIEFING**
) **SCHEDULE ON PLAINTIFF TESLA,**
) **INC.'S MOTION TO EXTEND CASE**
) **DEADLINES PURSUANT TO FED. R. CIV.**
) **PRO. 16(b)(4) [L.R. CIV. 6-2]**
)
) Dept.: Courtroom 4 – 17th Floor
) Judge: Hon. Vince Chhabria
)
)
)

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties to the above-entitled action
2 jointly submit this Stipulation to Shorten Briefing Schedule on Plaintiff Tesla, Inc.'s Motion to
3 Extend Case Deadlines Pursuant to Fed. R. Civ. P. 16(b)(4), to be filed on December 23, 2020.
4 The parties stipulate that Cao shall respond to Tesla's motion on or before Monday, January 4,
5 2021. Tesla may not file a reply. After Cao files his response, Tesla's motion shall be deemed
6 submitted to be decided on the papers.

7 WHEREAS, the parties agree that good cause supports the shortening of time for Cao to
8 respond to Tesla's Motion to Extend Case Deadlines Pursuant to Fed. R. Civ. P. 16(b)(4)),
9 including due to the upcoming expert disclosure deadline currently set for January 15, 2021,
10 which Tesla seeks to extend; and

11 WHEREAS, this stipulation is accompanied by a declaration from Tesla's counsel
12 explaining the reasons for the requested shortening of time, discloses all previous time
13 modifications in the case, and describes the effect the time modification would have on the
14 schedule for the case (none).

15 NOW, THEREFORE, in light of the facts and circumstances described above, IT IS
16 HEREBY STIPULATED by and between the parties, pursuant to Civil L.R. 6-1(b) and 6-2, as
17 follows:

- 18 1. Defendant Guangzhi Cao's time to respond to Plaintiff Tesla, Inc.'s Motion to
19 Extend Case Deadlines is shortened to January 4, 2021.
- 20 2. Plaintiff's Tesla, Inc. may not file a reply in support of its motion.
- 21 3. The parties deem the matter submitted to the Court to be decided on the papers
22 immediately after Defendant Guangzhi Cao files his opposition.
- 23 4. The parties shall make themselves available to present oral argument on Tesla's
24 motion, if the Court deems a hearing necessary and orders the parties to appear, at
25 the Court's regularly scheduled law and motion calendar on Thursday, January 7,
26 2021, at 10:00 a.m., or at such other time as the Court may require.

Respectfully submitted,

THE NORTON LAW FIRM PC

Date: December 23, 2020

By: /s/ Fred Norton
Fred Norton

Attorneys for Plaintiff
TESLA, INC.

CONRAD & METLITZKY LLP

Date: December 23, 2020

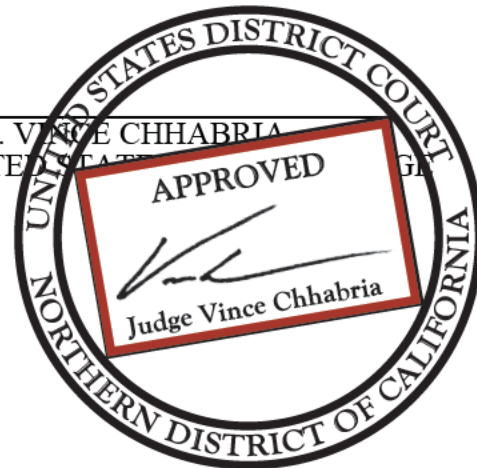
By: /s/ Mark Conrad
Mark Conrad

Attorneys for Defendant
GUANGZHI CAO

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: December 28, 2020

HON. VINCE CHHABRIA
UNITED STATES DISTRICT COURT



DECLARATION OF CONSENT

The undersigned attests, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the filing of the document has been obtained from the other signatories to this document.

Date: December 23, 2020

/s/ Fred Norton
Fred Norton